

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

**RACHELLE SHAW and MARKELL
HAREWOOD, Each Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFFS

vs.

No. 5:22-cv-396-M-KS

**OAK CITY PROTECTION, LLC
ALPHA DEFENSE GROUP CORP.,
AUSTIN TAYLOR and JASON YOUNG**

DEFENDANTS

DECLARATION OF ATTORNEY JOSH SANFORD

COMES NOW attorney Josh Sanford, after being duly sworn, and does hereby state on oath as follows:

1. I am over the age of 18, and legally qualified to execute this Declaration.
2. I am an attorney licensed and in good standing in the State of Arkansas. I practice law with the law firm of Sanford Law Firm, PLLC.
3. I am the attorney for Plaintiffs Rachelle Shaw and Markell Harewood.
4. Service of the Complaint and Summons for Defendant Oak City Protection, LLC, in this matter was made on October 25, 2022.
5. Service of the Complaint and Summons for Defendant Alpha Defense Group Corp. in this matter was made on February 28, 2023.
6. Service of the Complaint and Summons for Defendant Austin Taylor in this matter was made on October 25, 2022.
7. As of the filing of Plaintiffs' Motion for Clerk's Entry of Default, neither I nor any other attorney for Plaintiffs have received a responsive pleading or motion to dismiss

relating to this lawsuit from or on behalf of Defendant Oak City Protection, LLC, Alpha Defense Group Corp., or Austin Taylor and no extension has been requested.

8. I have granted no extension of any kind to Defendant Oak City Protection, LLC, Alpha Defense Group Corp., or Austin Taylor.

9. I know of no instances where Defendant Oak City Protection, LLC, Alpha Defense Group Corp., or Austin Taylor has attempted to contact myself or Sanford Law Firm, PLLC.

10. On August 22, 2023, an attorney with my law firm submitted a record request for Defendant Austin Taylor on the Servicemembers Civil Relief Act ("SCRA") Website, <https://scra.dmdc.osd.mil/scra/#/single-record>, and the Status Report that he received in response to his request from the Department of Defense Manpower Data Center confirmed that Defendant Austin Taylor is not an active duty servicemember of any branch of the United States Uniformed Services.

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Josh Sanford
JOSH SANFORD
Dated: August 22, 2023